

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA

LEOLA MILBRY; as the Personal
Representative of the Estate of EARLY
MILBRY, deceased,

Plaintiff,

vs.

GGNSC Montgomery, LLC (incorrectly
identified as BEVERLY HC TYSON d/b/a
TYSON MANOR, et al.),

Defendant.

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NO. 2:07-cv-837-MEF

NOTICE OF DEPOSITION DUCES TECUM

TO: Jock M. Smith, Esq.
Brian P. Strength, Esq.
Valerie Rucker Russell, Esq.
COCHRAN, CHERRY, GIVENS & SMITH, P.C.
306 North Main Street
Post Office Box 830419
Tuskegee, Alabama 36083

DEPONENT: Ms. Leola Milbry

DATE AND TIME: March 25, 2008 at 9:00 a.m. CDT

PLACE: Capell & Howard, P.C.
150 South Perry Street
Montgomery, Alabama 36104

COURT REPORTER: Freedom Court Reporting, Inc.
(877) 373-3660

Please take notice that ALFORD, CLAUSEN & McDONALD, LLC, attorneys for defendant, will take the deposition of the deponent named above, at the time, date and location indicated above, upon oral examination pursuant to the Alabama Rules of Civil Procedure before an officer duly authorized to administer oaths and swear witnesses. The oral examination will

continue from day to day until completed. The deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Alabama Rules of Civil Procedure.

The Deponent is requested to bring with her to the deposition the following items:

1. All items, including medical records, diaries, notes, letters, written statements, photographs, reports, opinions or documents of any other type which relate in any way to the allegations contained in Plaintiff's Complaint.



W. BENJAMIN BROADWATER (BRO150)
Attorney for GGNCS Montgomery, LLC

OF COUNSEL:

ALFORD, CLAUSEN & McDONALD, LLC
One St. Louis Centre, Suite 5000
Mobile, Alabama 36602
(251) 432-1600
(251) 432-1700 (fax)

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Notice of Deposition Duces Tecum of Leola Milbry on counsel for all parties by depositing a copy of same in the United States mail, properly addressed and first class postage prepaid:

Jock M. Smith, Esq.
Brian P. Strength, Esq.
Valerie Rucker Russell, Esq.
COCHRAN, CHERRY, GIVENS & SMITH, P.C.
306 North Main Street
Post Office Box 830419
Tuskegee, Alabama 36083

Done this 17th day of March 2008.



COUNSEL